

**AFFIDAVIT IN SUPPORT OF
A CRIMINAL COMPLAINT**

I, Kevin J. Connelly, a Senior Special Agent with the Bureau of Alcohol, Tobacco and Firearms, being first duly sworn, does hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Senior Special Agent for the United States Department of Justice, Bureau of Alcohol, Tobacco Firearms and Explosives, (ATF), and have been so employed since 2008. In 2014, I entered the ATF Certified Fire Investigator (CFI) training program. In 2016, I earned my certification as an ATF CFI and have been working in that capacity since that time. As a result of my training and experience as an ATF Special Agent and CFI, I am familiar with federal criminal law and know that an individual who violates the following statute may be guilty of arson: 18 U.S.C. § 844(i) - Whoever maliciously damages or destroys, or attempts to damage or destroy, by means of fire or an explosive, any building, vehicle, or other real or personal property used in interstate or foreign commerce.

2. The facts set forth in this affidavit are based upon my personal observations, my training and experience, and information obtained from various law enforcement personnel and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested complaint and warrant and does not purport to set forth all my knowledge of or investigation into this matter.

3. Based on my training and experience and the facts set forth in this affidavit, there is probable cause to believe that a violation of Title 18, United States Code, Section 844(i) (Arson), has been committed by SHANE GODFRIN ("GODFRIN").

4. This Court has jurisdiction to issue the requested warrant because it is "a court of competent jurisdiction" as defined by 18 U.S.C. § 2711. 18 U.S.C. §§ 2703(a),

(b)(1)(A), & (c)(1)(A). Specifically, the Court is “a district court of the United States . . . that has jurisdiction over the offenses being investigated.” 18 U.S.C. § 2711(3)(A)(i).

STATEMENT OF PROBABLE CAUSE

5. On February 8, 2025, at approximately 1:45pm, the mother of GODFRIN reported to the Houlton Regional Communications Center that her son had tried to light a vehicle on fire in the driveway of her residence in Orient, Maine (“the Residence”). GODFRIN's mother reported that GODFRIN had fled on foot. Subsequent investigation by law enforcement from the Maine State Police and the Office of the State Fire Marshal revealed the following information.

6. Victim 1, the sister-in-law of GODFRIN, stated that she had parked her rental vehicle in the driveway of the Residence. On the morning of February 8, 2025, Victim 1 stated that she saw GODFRIN when she went to check the Residence's mailbox. Victim 1 stated that GODFRIN was laying in a snowbank near the Residence.

7. A few moments later, Victim 1 saw GODFRIN light on fire a bottle with a what appeared to be a wick in it. GODFRIN then threw the lit bottle which landed near her rental vehicle and rolled underneath it. Photographs of the burnt bottle are included as Government Exhibits 1-3. Victim 1 stated that she jumped into her vehicle and moved it so the vehicle was not damaged. Victim 1 stated that she was not injured. Victim 1 stated that she heard GODFRIN yell, “I’m going to kill you bitch.” Victim 1 stated that she wasn’t sure if this threat was directed towards her or if GODFRIN was speaking to himself. Victim 1 stated that GODFRIN ran off towards a snowmobile trail down the road.

8. GODFRIN's mother stated that she did not see GODFRIN start the fire but she did see the fire under the vehicle.

9. GODFRIN's mother, GODFRIN's father, and Victim 1 stated that they fear GODFRIN and his erratic behavior. GODFRIN's mother stated that GODFRIN has told her repeatedly in the recent past that he wants to kill her. GODFRIN's mother stated that they are afraid that GODFRIN is going to come back and burn them out of their house. GODFRIN's mother stated that they sleep in shifts because they don't know what he is going to do.

10. GODFRIN's mother stated that GODFRIN loves pipe bombs and stuff of that nature. GODFRIN's mother and Victim 1 stated that GODFRIN always talks about blowing things up.

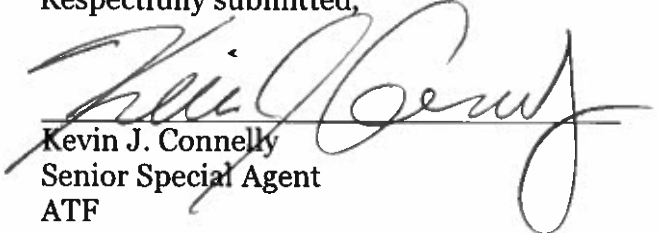
11. The vehicle rented by Victim 1 was identified as a 2025 Nissan Rogue (VIN: 5N1BT3BB2SC796201) bearing Massachusetts state license plate 6GTY27. The registration was effective as of November 14, 2024 and expires on July 11, 2026.

12. The vehicle was registered to EAN Holdings LLC with a registration address listed as 14002 East 21st St, Suite 1500, Tulsa OK 74134. EAN Holdings is the parent company of Enterprise Rent-A-Car.

CONCLUSION

Based on the forgoing, there is probable cause to believe that a violation of Title 18, United States Code, Section 844(i) (Arson), has been committed by GODFRIN.

Respectfully submitted,



Kevin J. Connelly
Senior Special Agent
ATF

Sworn to telephonically and signed
electronically in accordance with the
requirements of Rule 4.1 of the Federal Rules
of Criminal Procedure

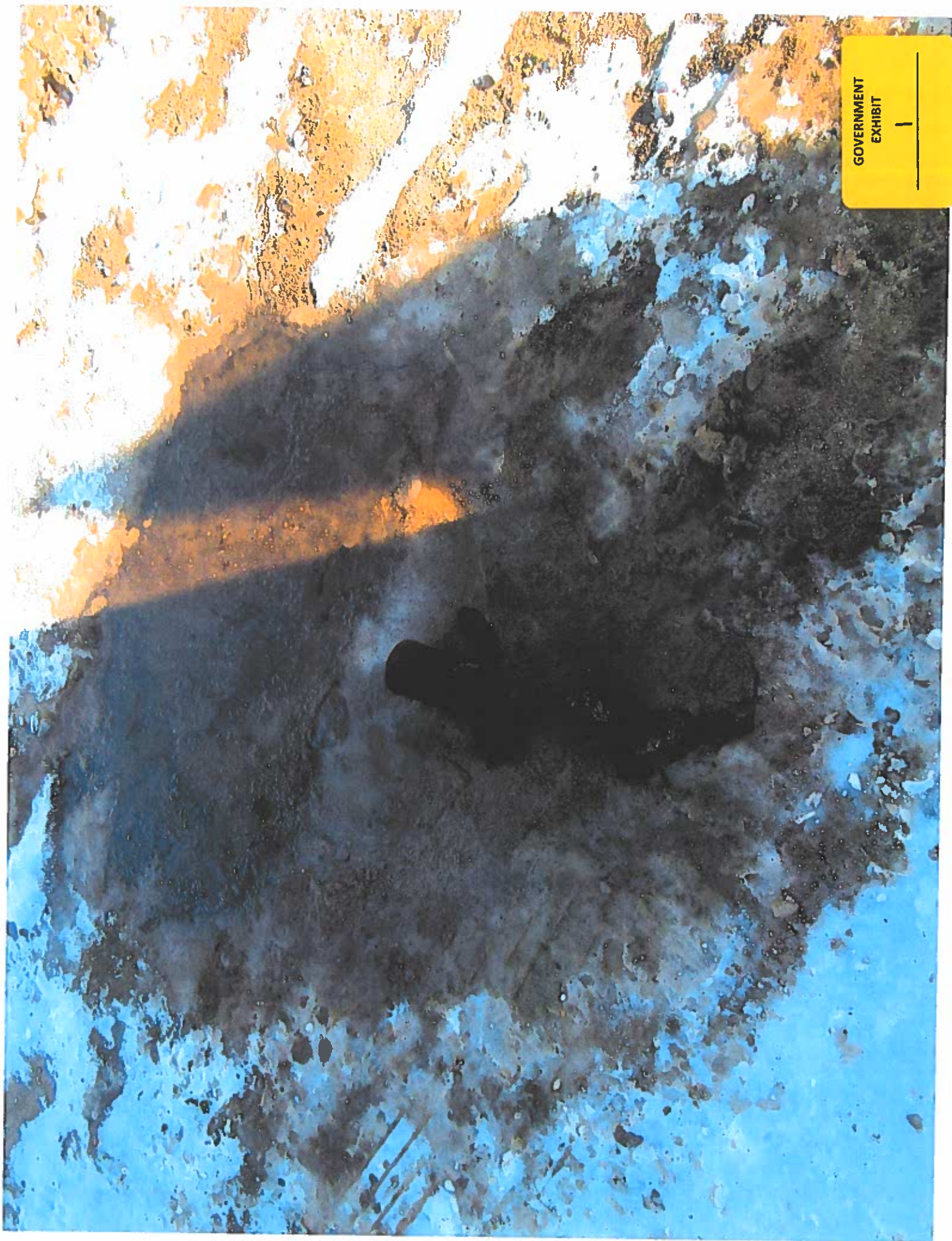
Date: May 19 2025

City and state: Bangor, ME




Judge's signature
John C. Nimson U.S. Magistrate Judge

Printed name and title



GOVERNMENT
EXHIBIT



